



Kieran J. Tuckley
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May 14, 2019

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460

Re: Follow up to Request EPA-HQ-2019-001960

Dear Sir/Madam:

On December 7, 2018, I submitted a Freedom of Information Act request to your office seeking documentation regarding sampling performed at an EPA laboratory on behalf of Susan Keller, Lyle Keller and/or Keller Bison & Bees, LLC (collectively referred to as "Keller"). *See* EPA-HQ-2019-001960. We received a production of records pursuant to that request on February 15, 2019. The production to us appears to be incomplete in that the data backup materials relevant to the testing were not provided. We are thus requesting that your office search for and locate the records identified below and produce them to us. The requested records are within the scope of the original request, "Documents pertaining to the methodology used to produce results for the samples provided by the Keller or their authorized agents" and we would thus ask that you produce them as soon as possible. We know of no exception to the statute that would have excluded these materials from your production, nor did you cite to any in responding to our original request.

If for any reason you believe these materials are not covered by the original request, please contact me to explain that determination and immediately process this request as a new request pursuant to 5 U.S.C 301 et seq., and produce the requested records within the time frames for an original request.

The records that appear to be missing and that we request be produced to us, include the following:

- a. The complete data packages for Lyle Keller's bees Sample ID's "brushy quarry; Doug McCracken B_1; Doug McCracken B_2; Home apiary 1a_1; Home apiary 1A_2; Home yard 2b_1; Home yard 2b_2; Pickle station" including but not limited to:
 - i. Chromatograms;

- ii. Calibration curves;
 - iii. Peak values;
 - iv. Peak targets;
 - v. Calculations;
 - vi. Mass of the samples;
 - vii. Raw data.
- b. Any spiked or calibration tests conducted in bee, pollen, or other material to identify the correct peaks for the test substances in matrix.
- c. Documentation, if any exists, confirming the methodology used to analyze the Keller bees Sample ID's "brushy quarry; Doug McCracken B_1; Doug McCracken B_2; Home apiary 1a_1; Home apiary 1A_2; Home yard 2b_1; Home yard 2b_2; Pickle station."
- d. A final report, if any exists, analyzing the results of the Keller bees Sample ID's "brushy quarry; Doug McCracken B_1; Doug McCracken B_2; Home apiary 1a_1; Home apiary 1A_2; Home yard 2b_1; Home yard 2b_2; Pickle station."

I am requesting that you email the information in an electronic format including formats for analytical chemistry software to KTuckley@crowell.com, with copy to LSanchez@crowell.com. If you do not have the information in electronic format, I request a copy of the records to be sent to the undersigned at the following address:

Kieran Tuckley
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington D.C., 20004

Please contact us as soon as possible with any costs that will be charged to obtain copies of the requested records pursuant to a duly adopted public records policy that is currently in effect. Please contact us as soon as possible if you have any questions or need any clarifications in order to comply with this request, or if you anticipate a lengthy delay before the United States Environmental Protection Agency will be able to provide the requested copies.

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Respectfully submitted,

A handwritten signature in blue ink, reading "K. Tuckley". The signature is written in a cursive, slightly slanted style.

Kieran Tuckley